

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS – FORT WORTH DIVISION**

LABOR SAVING SYSTEMS LTD.	§	
d/b/a Magnepull,	§	
<i>Plaintiff,</i>	§	
	§	Case No. 4:21-cv-01389-O
v.	§	
	§	
HARBOR FREIGHT TOOLS USA, INC.,	§	
DOES 1–79,	§	
<i>Defendants.</i>	§	

PLAINTIFF'S MOTION TO AMEND CAPTION

Plaintiff Labor Saving Systems Ltd. d/b/a as Magnepull (“Plaintiff”) files this Motion to Amend Caption and would show the Court as follows:

1. On December 31, 2021, Plaintiff filed a Complaint against Defendant Harbor Freight Tools USA, Inc. (“HFT”) and Defendants Does 1–79, seeking economic damages and injunctive relief for infringement of Plaintiff’s patent.
2. On this day, January 21, 2022, Plaintiff filed a Notice of Dismissal, dismissing all claims against HFT without prejudice.
3. Based on the foregoing, and because the caption so prominently features HFT, which is no longer a party, Plaintiff wishes to amend the above caption in order to reflect that HFT is not a Defendant in this action.
4. Plaintiff plans to amend its Complaint, in a separate filing, to focus on the Doe Defendants in this case and eliminate discussion of HFT, if this Motion is granted.
5. Additionally, if this Motion is granted, Plaintiff will timely file a response to the Findings, Conclusions, and Recommendation of the Magistrate Judge (doc. 11) that will include an amended proposed restraining order reflecting the new caption.

PRAYER

Accordingly, Plaintiff requests this Court instruct the Clerk to amend the above caption to reflect that Defendants Does 1–79 are the sole Defendants and to eliminate Harbor Freight Tools USA, Inc. as a Defendant on the docket.

Respectfully submitted,

/s/Warren V. Norred, P.E.

Warren V. Norred, P.E.

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Counsel for Plaintiff

CERTIFICATE OF SERVICE - I certify that a copy of the attached document was served informally to Harbor Freight by email on January 21, 2022, to its counsel, Dave Grable <davegrable@quinnmanuel.com> and Eric Huang <erichuang@quinnmanuel.com>.

/s/ Warren V. Norred

Warren V. Norred

CERTIFICATE OF CONFERENCE No defendant has appeared yet in this case, and therefore, pursuant to Local Rule 7.1b, undersigned counsel states that he is unable to meet and confer with the defendants and unable to state whether this motion is opposed.

/s/ Warren V. Norred

Warren V. Norred